



737 Bishop Street
Suite 1900
Honolulu, HI 96813

Via ECFS

March 2, 2006

Marlene H. Dortch
Office of the Secretary
Federal Communication Commission
445 12th Street SW
Washington, DC 20554

Re: **WC DOCKET NO. 05-196 – VOLUNTARY STATUS UPDATE**

Dear Ms. Dortch:

Pursuant to Pacific LightNet, Inc.'s (PLNI) November 28, 2005 Compliance Letter filed in the above referenced docket with respect to the 911 coverage requirements of the FCC's *VoIP E911 Order*,¹ PLNI hereby submits the following voluntary status update concerning grandfathered customers² with Registered Locations outside the state of Hawaii.

As of November 28, 2005, PLNI had less than 30 existing customers with Registered Locations outside the state of Hawaii. Pursuant to the Enforcement Bureau's November 7, 2005 Public Notice, PLNI grandfathered those existing customers so that they can continue to use their service from their registered primary location (and nomadically in Hawaii, where PLNI is able to provide 911 service) while PLNI works to expand its 911-capable service area. On December 2, 2005, PLNI sent a letter and e-mail notice to all grandfathered customers reminding them that PLNI is not currently able to offer 911 services at their Registered Location.

PLNI continues to investigate alternatives to achieve nationwide e911 compliance. With respect to its most likely scenario for achieving nationwide e911 compliance, PLNI is currently working with the incumbent LEC in Hawaii on a conversion project that would provide PLNI access to the Intrado system. PLNI is not currently able to estimate a completion date, particularly in light of the extensive transition efforts and resources of the incumbent LEC dedicated to the LEC's establishment of back office functions separate and apart from its former owner, Verizon Communications.

PLNI will provide another voluntary update to the Enforcement Bureau on the status of the grandfathered customers by June 1, 2006.

¹ *IP-Enabled Services and E911 Requirements for IP-Enabled Service Providers*, First Report and Order and Notice of Proposed Rulemaking, 2005 WL 1323217, FCC, (rel. Jun 3, 2005).

² In its November 7, 2005 Public Notice (DA05-2945), the Enforcement Bureau stated "[a]lthough we do not require providers that have not achieved full 911 compliance by November 28, 2005, to discontinue the provision of interconnected VoIP service to any existing customers, we do expect that such providers will discontinue marketing VoIP service, and accepting new customer for their service, in all areas where they are not transmitting 911 calls to the appropriate PSAP in full compliance with the Commission's rules.

March 3, 2006

If you have any questions concerning this status update, please feel free to contact me at (808) 791-3068.

Sincerely,

Michael Frane
Director of Strategic Business Operations